

Comments on "MSCS User Guide"

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General comments

1. I thought that the guide could have at least 2 functions:

- 1) as stated in Pete's cover e-mail, to aid agency biologists who will review the MSCS for adequacy, and write programmatic biological opinions, and
- 2) to aid consultant and agency biologist in completing ASIPs and project-specific consultations.

The second aim might be promoted by adding to section labels language familiar to most consulting biologists. For instance the section labeled "MSCS species" could be labeled in parentheses (Species List), because the species list is typically the first step in initiating the consultation process.

The current organizational structure of the guide appears to be driven by chapter order in the MSCS. An alternative approach might be to use an objective oriented format driven by the typical steps in the consultation process to organize the sections. In this format headings in the guide would be based primarily on consultation steps; e.g.,

Species list (MSCS species)

Biological Assessment

Major construction activities (CALFED Actions Evaluated in the MSCS)

Likely effects (Impacts Analysis; Impact Analysis Results)

Species (MSCS Goals and Prescriptions)

Habitats (MSCS Communities and NCCP Habitats; Species-habitat assoc.)

Cumulative effects (Impact Analysis Results)

Biological Opinion

Environmental baseline (CALFED Actions Evaluated in the MSCS)

Conservation recommendations (MSCS Conservation Measures)

2. Another change that has more substance would be to make the guide more information rich; the current version often is too much like a table of contents. I don't think it's enough to say where something is; I prefer saying something about the how or why of an item, then give its MSCS location in parens, much like citing literature in a paper. For example:

MSCS Species Goals and Prescriptions

1. MSCS species goals, "recover (R)," "contribute to recovery (r)," and "maintain (m)" were developed specifically for the CalFed program (pages 3-1 to 3-3).
2. One of these goals was assigned to each covered species (Table 2-2).
3. The MSCS provides species-specific prescriptions for measuring progress toward achieving goals for each "R" and "r" species (Table 3-1).

MSCS Communities and NCCP habitats

1. The MSCS evaluates 20 communities. Communities include two fish groups (estuarine and anadromous fish groups) and 18 NCCP habitats (pages 2-2 to 2-5 and Table 2-1).
2. The process for defining NCCP habitats was guided by consistency with accepted classification schemes and available data (page 2-2)

Species-habitat Associations

1. as is
2. Species-habitat associations were determined primarily through consultation with species experts and include only habitats in which species regularly occur and which are essential for maintaining population abundance (page 5-11).
3. To facilitate assessment of impacts, species-habitat associations are provided for each evaluated species (Attachment 3: Evaluated Species Associated with NCCP Habitats; Table A – animals, Table B – plants).

CalFed actions Evaluated in the MSCS

1. as is
2. Not all CalFed actions could be evaluated in the MSCS. Proposed program actions with little or no potential to affect NCCP communities were not evaluated (pages 5-2 to 5-3).

Clearly, I've gotten carried away here...but I feel strongly that this approach improves the info content and "useability" of the guide.